

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

NATERA, INC.,

Plaintiff,

v.

NEOGENOMICS LABORATORIES,
INC.,

Defendant.

C.A. No. 1:23-cv-629

**JOINT MOTION FOR PARTIAL DISMISSAL AND ENTRY OF A STIPULATED
PERMANENT INJUNCTION**

Plaintiff Natera, Inc. and Defendant NeoGenomics Laboratories, Inc. (collectively “the Parties”), jointly move the Court for entry of the attached proposed order dismissing certain of the Parties’ claims for relief and enjoining, with certain exceptions, the making, using, selling, or offering for sale in the United States the RaDaR 1.0 Assay. The Parties request and understand that the dismissal of their respective claims for relief is contingent upon entry by the Court of the proposed injunction in substantially the format agreed upon by the Parties.

Respectfully submitted this 20th day of September, 2024.

By: /s/ Robert C. Van Arnam
Robert C. Van Arnam (N.C. Bar No. 28838)
Andrew R. Shores (N.C. Bar No. 46600)
WILLIAMS MULLEN
P.O. Drawer 1000
Raleigh, NC 27602-1000
Telephone: (919) 981-4015
Fax: (919) 981-4300
rvanarnam@williamsmullen.com
ashores@williamsmullen.com

QUINN EMANUEL URQUHART
& SULLIVAN, LLP

Kevin P.B. Johnson*
Victoria F. Maroulis*
555 Twin Dolphin Shores, 5th Floor
Redwood Shores, CA 94065
(650) 801-5000

Andrew Bramhall*
Kevin Smith*
Tara Srinivasan, Ph.D.*
50 California Street, 22nd Floor
San Francisco, CA 94111
(415) 875-6600

Sandra Haberny, Ph.D.*
865 South Figueroa Street, 10th
Floor
Los Angeles, CA 90017
(213) 443-3000

Counsel for Natera

**Special Appearance under Local Civil Rule
83.1(d)*

This the 20th day of September, 2024

/s/ Matthew Kreeger
DARALYN J. DURIE*
MATTHEW I. KREEGER*
ANNIE A. LEE*
JACK WILLIAM HAISMAN*
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, CA 94105
Tel: (415) 268-7000
Fax: (415) 268-7522
DDurie@mofo.com
MKreeger@mofo.com
AnnieLee@mofo.com
JHaisman@mofo.com

CHARLES CALHOUN PROVINE*
MORRISON & FOERSTER LLP
2100 L Street NW, Suite 900
Washington, DC 20037
Tel: (202) 887-1500
Fax: (202) 887-0763
CProvine@mofo.com

ERIC NIKOLAIDES*
MORRISON & FOERSTER LLP
250 West 55th St.
New York, NY 10019
Tel: (212) 336-4061
ENikolaides@mofo.com

AARON G. FOUNTAIN*
HUI ZHAO*
MORRISON & FOERSTER
300 Colorado Street, Suite 1800
Austin, TX 78701
Tel: (737) 309-0700
AFountain@mofo.com
HZhao@mofo.com

MATTHEW R. STEPHENS*
MORRISON & FOERSTER LLP
12531 High Bluff Drive, Suite 100
San Diego, CA 92130
Tel: (858) 720-5100
Fax: (858) 720-5125
MStephens@mofo.com

JOHN F. MORROW, JR.
JOHN D. WOOTEN IV
WOMBLE BOND DICKINSON (US) LLP
One West Fourth Street
Winston-Salem, NC 27101
Tel: 336-721-3584
Fax: 336-733-8429
Email: John.Morrow@wbd-us.com
JD.Wooten@wbd-us.com

Counsel for NeoGenomics Laboratories, Inc.
**Special Appearance under Local Civil Rule*
83.1(d)

CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing document to be electronically filed with the Clerk of Court using the CM/ECF system, which will give notice of such filing to all attorneys currently of record in the above-captioned case.

Dated: September 20, 2024

By: /s/ Andrew R. Shores

Andrew R. Shores (N.C. Bar No. 46600)

WILLIAMS MULLEN

P.O. Drawer 1000

Raleigh, NC 27602-1000

Telephone: (919) 981-4015

Fax: (919) 981-4300

ashores@williamsmullen.com

Counsel for Plaintiff Natera, Inc.